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Attorneys for Defendants Oleg Batratchenko, Thor United Corp., Thor United Corp. (Nevis), Thor Real Estate Master Fund, Ltd., Thor Guarant Real Estate Fund, Ltd., Thor Opti-Max LLC, Thor Opti-Max Fund, Ltd., Thor Asset Management, Inc., Thor Real Estate Management LLC, Thor Capital LLC, Thor Futures LLC, and Thor Realty LLC

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

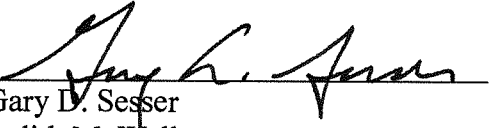
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LUDMILA LOGINOVSKAYA,	:
	:
Plaintiff,	: Case No. 12 Civ. 0336 (JPO)
	:
- against -	: <u>ECF Case</u>
	:
OLEG BATRATCHENKO, TATIANA SMIRNOVA	:
(a/k/a TATIANA SMIRNOFF, a/k/a TATIANA	:
BATRATCHENKO), THOR UNITED CORP.,	:
THOR UNITED CORP. (NEVIS), THOR REAL	:
ESTATE MASTER FUND, LTD., THOR	: NOTICE OF
GUARANT REAL ESTATE FUND, LTD., THOR	: BATRATCHENKO'S
OPTI-MAX LLC, THOR OPTI-MAX FUND, LTD.,	: AND THE THOR
THOR ASSET MANAGEMENT, INC., THOR	: DEFENDANTS'
REAL ESTATE MANAGEMENT LLC, THOR	: MOTION TO DISMISS
CAPITAL LLC, THOR FUTURES LLC, THOR	: <u>THE AMENDED COMPLAINT</u>
REALTY LLC, and John Does 1-20,	:
	:
Defendants.	:
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Declaration of Judith M. Wallace dated July 5, 2012, and Exhibits 1 through 4 annexed thereto, Defendants Oleg Batratchenko ("Batratchenko"), Thor United Corp., Thor United Corp. (Nevis), Thor Real Estate Master Fund, Ltd., Thor Guarant Real Estate Fund, Ltd., Thor Opti-Max LLC, Thor Opti-Max Fund, Ltd., Thor Asset Management, Inc., Thor Real Estate Management LLC, Thor Capital LLC, Thor Futures LLC, and Thor Realty LLC (hereafter,

the “Thor Entities” and, together with Mr. Batratchenko, the “Batratchenko and the Thor Defendants”), by and through their attorneys Carter Ledyard & Milburn LLP, will move this Court, before J. Paul Oetken, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date to be determined by the Court, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure dismissing the Amended Complaint and granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York
July 5, 2012

CARTER LEDYARD & MILBURN LLP

By: 
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